

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU Investments LLC	§	
doing business as	§	
Brazos Licensing and Development,	§	
	§	
Plaintiffs,	§	Civil Action No. 6:20-cv-00952-ADA
	§	Civil Action No. 6:20-cv-00953-ADA
v.	§	Civil Action No. 6:20-cv-00956-ADA
	§	Civil Action No. 6:20-cv-00957-ADA
Oneplus Technology (Shenzhen) Co., Ltd.,	§	Civil Action No. 6:20-cv-00958-ADA
	§	
Defendant.	§	Jury Trial Demanded
	§	
	§	
	§	

**DECLARATION OF ELIZABETH M. CHIAVIELLO IN SUPPORT OF DEFENDANT’S
MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS AND LACK OF
PERSONAL JURISDICTION**

I, Elizabeth M. Chiaviello, declare:

1. I am an attorney duly admitted to practice law in Texas. I am an attorney in the law firm of Morgan, Lewis & Bockius LLP, counsel of record for Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“Defendant”) in the above-captioned action. I make this declaration based on my own personal knowledge and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct excerpt of <https://www.hcch.net/en/instruments/conventions/status-table/print/?cid=17>, a website provided by the Hague Conference on private international law listing contracting parties to the Hague Convention.

3. Attached hereto as Exhibit 2 is a true and correct copy of <https://www.hcch.net/en/states/authorities/details3/?aid=243>, a website provided by the Hague Conference on private international law detailing the Central Authority and practical information as to China’s accession to Hague Convention.

4. Attached hereto as Exhibit 3 is a true and correct copy of <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/China.html>, a website provided by the U.S. State Department titled “China Judicial Assistance Information.”

5. Attached hereto as Exhibit 4 is a true and correct copy of <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/RussianFederation.html>, a website provided by the U.S. State Department titled “Russia Judicial Assistance Information.”

6. Attached hereto as Exhibit 5 is a chart summarizing the 192 court cases filed by WSOU Investments, LLC, including the Case Name, Date Filed, Docket No., and whether a Motion for Alternative Service has been filed.

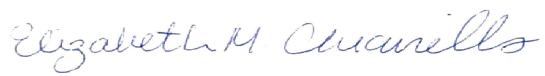
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and understanding.

Executed this 26th day of February, 2021.

Dated: February 26, 2021

RESPECTFULLY SUBMITTED,

MORGAN, LEWIS & BOCKIUS LLP

By: 
Elizabeth M. Chiaviello
elizabeth.chiaviello@morganlewis.com

1000 Louisiana Street, Suite 4000
Houston, TX 77002-5005
Telephone: +1.713.890.5000
Facsimile: +1.713.890.5001

Attorneys for Defendant